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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Keith H. Asbell,	Case No.: 2:17-cv-03122-JCM-PAL
Plaintiff, v. Experian Information Solutions, Inc. and Trans Union LLC, Defendants.	Stipulation for an extension of time for Plaintiff to Respond to Trans Union LLC's Motion to Dismiss [ECF No. 16] (Second Request)

Plaintiff Keith H. Asbell ("Plaintiff") and Trans Union LLC ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **April 26, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's First Amended Complaint, filed on March 15, 2018, ECF No. 16. Plaintiff's Response is currently due on April 12, 2018.

STIPULATION Case No.: 2:17-cv-03122-JCM-PAL

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Plaintiff filed his Complaint on December 27, 2017. ECF No. 1. Defendant filed its motion to dismiss on February 15, 2018. ECF No. 11. On March 1, 2018, Plaintiff filed his First Amended Complaint. ECF No. 15. On March 15, 2018, Defendant filed its pending Motion to Dismiss Plaintiff's Amended Complaint. ECF No. 16. Plaintiff's Response is due on March 29, 2018. *Id.* The Parties are continuing to actively discuss resolution of the case and, in good faith and not for the purposes of delay, Plaintiff has requested and Defendant has agreed to allow Plaintiff an additional 14 days to respond to the Motion. The Parties in good faith stipulate to allow additional time for Plaintiff to respond to the Motion. This is the second request for an extension of this deadline.

The Parties therefore stipulate that Plaintiff's response to Defendant's motion to dismiss, ECF. No. 16, shall be due on or before April 26, 2018. DATED this 12th day of April 2018.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind Michael Kind, Esq. 6069 South Fort Apache Road, Suite 100 Las Vegas, Nevada 89148 Attorneys for Plaintiff

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Jason Revzin Jason Revzin, Esq. 6385 S. Rainbow Blvd., Suite 600 Las Vegas, NV 89118 Attorneys for Defendant Trans Union LLC

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Xelius C. Mahan

DATED: April 12, 2018

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on April 12, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u>
Michael Kind
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

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STIPULATION Case No.: 2:17-cv-03122-JCM-PAL